No. 49244-0-II

COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

STATE OF WASHINGTON, RESPONDENT

V.

CHARLES LONGSHORE, III, APPELLANT

Appeal from the Superior Court of Mason County
The Honorable Amber L. Finlay, Judge

No. 12-1-00219-3

BRIEF OF RESPONDENT

MICHAEL DORCY
Mason County Prosecuting Attorney

By
TIM HIGGS
Deputy Prosecuting Attorney
WSBA #25919

521 N. Fourth Street
PO Box 639
Shelton, WA 98584
PH: (360) 427-9670 ext. 417

TABLE OF CONTENTS

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

TABLE OF AUTHORITIES

Table of Cases

Page

State Cases

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

Federal Cases

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

Statutes

Constitutions

Court Rules

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

A. STATE'S COUNTER-STATEMENTS OF ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR

1. The trial court did not enter written findings of fact and conclusions of law after denying Longshore's motion for dismissal under CrR 8.3(b). Court rules require the court to give its reasons in writing when grants a CrR 8.3(b) motion, but there is no similar requirement for a written ruling or order when the court denies such a motion. In any event, the trial court's oral ruling in this case provides an adequate record for this Court's review.

2. The record of this case shows that the intrusion into the attorney-client privileged communication at issue here was an inadvertent intrusion that did not cause any prejudice to Longshore's right to a fair trial and that, as such, the trial court did not abuse its discretion when it denied Longshore's CrR 8.3(b) motion to dismiss the case.

3. Irrespective of whether the State is the substantially prevailing party in this appeal, the State does not intend to seek appellate costs.

B. FACTS AND STATEMENT OF THE CASE

For the purposes of the issues raised in this appeal, the State accepts Longshore's statement of facts, except where contrary or additional facts are provided in the argument sections below as needed to develop the State's arguments. RAP 10.3(b).

C. ARGUMENT

1. The trial court did not enter written findings of fact and conclusions of law after denying Longshore's motion for dismissal under CrR 8.3(b). Court rules require the

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

> court to give its reasons in writing when grants a CrR 8.3(b) motion, but there is no similar requirement for a written ruling or order when the court denies such a motion. In any event, the trial court's oral ruling in this case provides an adequate record for this Court's review.

CrR 8.3(b), titled "On Motion of Court," provides as follows:

> **(b) On Motion of Court.** The court, in the furtherance of justice, after notice and hearing, may dismiss any criminal prosecution due to arbitrary action or governmental misconduct when there has been prejudice to the rights of the accused which materially affect the accused's right to a fair trial. The court shall set forth its reasons in a written order.

Thus, the rule requires that if the court dismisses any case pursuant to the rule, the court must "set forth its reasons in a written order," but the rule is silent as to what process the court should follow in the event that it exercises its discretion to not dismiss the case on its own motion. CrR 8.3(b).

Here, Longshore motioned the trial court to dismiss the case pursuant to CrR 8.3(b), and presumably the trial court adopted Longshore's motion as its own motion. CP 234. The trial court considered the briefing, memoranda, and affidavits or declarations filed by the parties, and the court held a lengthy hearing on the matter. CP 23-91, 93-110, 111-220, 222-23, 224-27, 228-33; RP 5-15, 16-125.

After taking the matter under advisement, RP 124-25, the court delivered a lengthy oral ruling denying the court's motion. RP 126-38.

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

The trial court then entered a short written order, which stated as follows: "[T]he defendant's Motion to Dismiss filed on March 14, 2016, is hereby denied. Findings to be presented later." CP 21. It appears that to date neither party nor the court has presented written findings.

Longshore contends that the absence of written findings in this instance is error for which the remedy should be remand to the trial court for entry of written findings. Br. of Appellant at 9. Longshore concedes that "CrR 8.3(b) does not expressly mandate the entry of findings and conclusions." Nevertheless, Longshore contends that the absence of written findings is error in the instant case. Br. of Appellant at 6-9.

To support his contention, Longshore first cites *State v. Pena*, 65 Wn. App. 711, 829 P.2d 256 (1992), *overruled on other grounds, State v. Alvarez*, 128 Wn.2d 1, 18-19, 904 P.2d 754 (1995), and *State v. Jones*, 34 Wn. App. 848, 851, 664 P.2d 12 (1983). Br. of Appellant at 7. But *Pena* does not support Longshore's argument, because the issue in *Pena* was whether the trial court erred when it failed to abide by the mandatory requirements of JuCR 7.11(d), which required the trial court to enter written findings following a juvenile court bench trial if and when the trial results in a guilty finding that the juvenile appeals. *State v. Pena*, 65 Wn. App. at 713. The instant case presents no such issue.

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

Similarly, *State v. Jones* also does not support Longshore's argument, because at issue in *Jones* was whether the trial court, in disobedience of RCW 4.44.050, RCW 10.46.070, and CR 52, erred by failing to enter "formal findings of fact and conclusions of law as to each element of a crime charged." *State v. Jones*, 34 Wn. App. 848, 850, 664 P.2d 12, 14 (1983). The instant case, however, presents no such issue.

Longshore cites *State v. Wilson*, 108 Wn. App. 774, 31 P.3d 43 (2001), to support his contention that CrR 8.3(b) "require[s] the trial court to state the reasoning behind its decision in a written order." Br. of Appellant at 7. But *Wilson* does not support Longshore's contention in the context of the instant case, because at issue in *Wilson* was whether the trial court erred by failing to give written reasons for the court's *dismissal* of the case. *State v. Wilson*, 108 Wn. App. at 777. Here, the trial court denied the CrR 8.3(b) motion and *did not dismiss* the case. CP 21; RP 126-38. *Wilson* did not address the issue of whether the trial court would be required to give written reasons for its order when it denies a CrR 8.3(b) motion and does not dismiss the case.

To further support his contention, Longshore next cites *Ferree v. Doric Co.*, 62 Wn.2d 561, 567, 383 P.2d 587 (1997), for its restatement of the rule that "a trial court's oral statements are 'no more than a verbal

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

expression of informal opinion at that time' which are later 'subject to further study and consideration, and may be modified, or completely abandoned.'" Br. of Appellant at 7, quoting *Ferree* at 567. However, distinct from the instant case, in *Ferree* the trial court did issue a written order, and at issue in *Ferree* was whether the trial court's oral statements could be offered to impeach the final, written order that had supplanted the oral statements. *Id.* The instant case presents no such issue; therefore, *Ferree* does not support Longshore's contention on appeal. *Id.* However, *Ferree* is persuasive for its restatement of the rule that "if the court's oral decision is consistent with the findings and judgment, it may be used to interpret them." *Id.* at 567.

Longshore next cites *State v. Michielli*, 132 Wn.2d 229, 937 P.2d 587 (1997), to support his contention. Br. of Appellant at 7. But *Michielli* did not involve circumstances such as those present in the instant case, where the trial court *denied* the CrR 8.3(b) motion and *did not dismiss* the case. *Id.* Instead, the circumstances of *Michielli* were that the trial court *dismissed* amended charges pursuant to CrR 8.3(b) but did not give detailed reasons *for the dismissal* as required by the rule. *Michielli* at 241-43. However, despite the insufficiency of the trial court's written order, the *Michielli* Court nevertheless looked to the pleadings and record in the

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

trial court and, notwithstanding the absence of written findings, found that the trial court record and pleadings were sufficient to sustain the trial court's order. *Id.* at 243-246.

Finally, Longshore cites *State v. Head*, 136 Wn.2d 619, 621, 964 P.2d 1187 (1998), and *State v. Smith*, 68 Wn. App. 201, 211, 842 P.2d 494 (1992), to support his contention in the instant case. Br. of Appellant at 9. But unlike the instant case, *Head* involved the trial court's failure to abide the CrR 6.1(d) requirement of entering written findings of fact and conclusions of law following conviction at a bench trial, *Head* at 621, and *Smith* involved the trial court's failure to enter written findings and conclusions as required by CrR 3.6 following a suppression hearing that was brought pursuant to CrR 3.6. *Smith* at 202, 207-08. But neither CrR 6.1(d) nor CrR 3.6 is at issue in the instant case.

Here, distinct from those cases cited by Longshore, the trial court denied the CrR 8.3(b) motion and did not dismiss the case. CP 21; RP 126-38. Although CrR 8.3(b) requires the trial court to give reasons in writing when it takes the extraordinary step of dismissing a case, it does not specifically require that the trial court make written findings or give reasons in writing when it denies a CrR 8.3(b) motion. Finally, the State contends that because the trial court gave a comprehensive oral ruling in

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

this case, RP 126-38, written findings – while preferable – were not required. *See, e.g., State v. Mitchell*, 169 Wn.2d 437, 447-48, 237 P.3d 282 (2010) (if a court's oral ruling is sufficient to provide a basis for appellate review, written findings are not required).

2. The record of this case shows that the intrusion into the attorney-client privileged communication at issue here was an inadvertent intrusion that did not cause any prejudice to Longshore's right to a fair trial and that, as such, the trial court did not abuse its discretion when it denied Longshore's CrR 8.3(b) motion to dismiss the case.

On December 18, 2014, the trial court entered judgment and sentence in this case. CP 256-66. A little more than 14 months later, on March 14, 2016, Longshore filed a motion to dismiss in the trial court. CP 234. This appeal arises out of the trial court's denial of Longshore's motion. CP 19.

In the caption of his motion, Longshore stated he was bringing the motion pursuant to CrR 8.3(b). CP 234. In the body of the motion, Longshore alleged that the State denied him the effective assistance of counsel. CP 234.

The factual background for Longshore's motion is that, on June 22, 2012, while Longshore was in custody awaiting trial (trial started on October 14, 2014), Detective Moran of the Shelton Police Department

made photocopies of some papers that Longshore left behind in the Mason County Jail when the jail transferred him to the Washington Corrections Center (WCC). CP 111-19, 207-09. Jail staff asked Longshore to separate his legal papers from his other papers so that he could take his legal papers with him to WCC and could leave his other papers behind. CP 114-15, 183-84, 187-88, 207-09. Jail staff discovered that Longshore had left drawings and writings on the wall of his cell; so, they called Detective Moran of the Shelton Police Department. *Id.* Detective Moran arrived to photograph the drawings and writings, and while he was there he learned that the papers that Longshore left behind were correspondence to a codefendant who, like Longshore, was an inmate in the jail. *Id.* Jail rules prohibit correspondence between inmates. *Id.*; CP 189-201. Detective Moran photocopied the commingled batch of papers that Longshore had left behind. *Id.*

A single page out of those 45 pages is the subject of Longshore's trial court motion and current appeal. The one page at issue appears in the record at CP 33, where it is embedded in Longshore's pleading entitled "Supplemental Evidence in Support of Motion to Dismiss[,]" which Longshore filed in the trial court on April 19, 2016. This one page at issue here has the words "Questions for Attorney" written across the top of it.

CP 33. These words are somewhat obstructed by paper-punch holes. *Id.* Following the caption, the page has seven enumerated bullet-point type statements. *Id.* Detective Moran did not notice the reference to an attorney, and so he inadvertently photocopied this page, along with the 44 additional pages within which the single page was comingled, and he sent photocopies of the entire commingled batch of papers to the prosecutor's office. CP 112-19; CP 207-09. The prosecutor's office, also, did not notice the reference to "attorney" at the top of the page, and the prosecutor's office then photocopied the entire commingled batch of papers and distributed them to the defendant and each of the codefendants as potential discovery in the case. CP 112-19.

On appeal, Longshore contends as follows:

> In the case at bar, the defendant argues that the trial court should have dismissed under CrR 8.3 because the police seizure of and the police and prosecutor's review of a document that obviously constituted a privileged communication between the defendant and his attorney not only violated the attorney-client privilege under Washington Constitution, Article 1, § 22, and United States Constitution, Sixth Amendment, but it also caused prejudice. At a minimum the document revealed the defendant's decision to go to trial under all circumstances and thus spurred a decision by the [S]tate to enter deals with the co-defendants to testify against the defendant as the privileged document made it clear that the defendant would not enter any type of deal with the prosecution. Given this prejudice, the trial court in this case erred when it refused to grant the defendant's motion, vacate his conviction and dismiss the charges under CrR 8.3(b).

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

Brief of Appellant at 11-12.

a) Was the single page at issue here a confidential attorney-client communication as averred by Longshore?

The State's position in this case is that Officer Moran's discovery and seizure of the single page at issue, CP 33, was inadvertent and that the prosecutor's dissemination of the page in discovery was also inadvertent. As such, the State is not suggesting that it had a right to seize or disseminate the page. It was only as an afterthought, after the accidental seizure and dissemination had already occurred, that it then became an issue for exploration and analysis about whether the page at issue possibly might not be a confidential attorney-client communication. The State's position is that it was an unfortunate accident that the commingled page at issue here, CP 33, was inadvertently seized and disseminated. However, after the parties discovered that the seizure and dissemination had already inadvertently occurred, this discovery led to analysis of the factual and legal issues implicated, and the question then arose about whether the page at issue was, in fact, an attorney-client communication.

First of all, the page at issue here, CP 33, is and was of absolutely no evidentiary, strategic, or tactical value to the State's prosecution of this

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

case. None of the seven enumerated items listed on the page reveal anything useful to the prosecution. The State has experienced nothing but difficulty due to this inadvertent seizure and dissemination. With absolutely no possibility of useful gain from it, it is reasonable to conclude that, even if some argument might be advanced that the page was not privileged, the State would have nevertheless protected the page from view, rather than to seize and disseminate it, if it had known about it – in other words it would have been completely illogical and absolutely of no benefit to the State to knowingly seize and disseminate the page at issue, which, therefore, leads to a logical inference and conclusion that the seizure and dissemination was unknowing and inadvertent.

Nevertheless, in hindsight it is arguable that the page was not confidential. Longshore commingled it among correspondence with Erica Rodriguez, so it appears that Longshore might have actually intended it to be further correspondence with Rodriguez rather than with his attorney. CP 33; CP 112-19, 183-84, 187-88, 207-09. For example, item one directs the reader to explain how Longshore and a codefendant were arrested, and it directs the reader to ask questions about the legality of the arrest. CP 33. Item 2 leads off with the phrase "[i]n my case". CP 33. These statements suggest that Longshore is distinguishing his own case from the

reader's case and that he is directing the reader to ask her own attorney about the things on this list.

Additionally, Longshore himself created the conditions that led to the State's inadvertent seizure and dissemination of the single page at issue. Longshore wrote the word "attorney" on the top margin of the page, and if the State had viewed this page in isolation, then the word "attorney" might have been noticed. CP 33. But Longshore failed to protect this page and failed to segregate it from the contraband in his cell; instead, he commingled it with the contraband, and the commingling was the cause of the inadvertent seizure. CP 112-19, 183-84, 187-88, 207-09. Under these circumstances, it is arguable that Longshore waived the attorney-client privilege in regards to the page at issue. *See, e.g., Sitterson v. Evergreen Sch. Dist. No. 114*, 147 Wn. App. 576, 585, 196 P.3d 735 (2008) (among other factors to consider, waiver may occur where precautions taken to prevent disclosure are unreasonable). Obviously, if anyone would have noticed the word "attorney" on the top of the page, the prudent and right thing to do would have been to isolate the page, to assume that Longshore had accidentally disclosed it, and to treat it as a confidential attorney-client communication – but unfortunately no one

noticed the word "attorney" until after the page had been inadvertently seized and disseminated. CP 112-19, 183-84, 187-88, 207-09.

Still more, most of the information on the page at issue is not about this case, and where it is about this case, Longshore has also disclosed the information in other correspondence with Rodriguez, or both. For example, item 4, which is about marriage, is not about this case, and similar disclosures occur at RP 150, 155, 159, 166, and 169 in non-privileged correspondence to Rodriguez. Also, item 1 (which is apparently about this case) is disclosed in other correspondence to Rodriguez at RP 181, where Longshore coaches Rodriguez on his attempt to characterize their arrests as illegal. At RP 64 and RP 176, in correspondence with Rodriguez, Longshore discusses the same idea as that which is found in item 2. At RP 180, in correspondence to Rodriguez, Longshore discusses his plan to bring a civil suit based on the loss of his vehicle (a topic that is not about this case), and this is the same idea that is mentioned in item 6 of the page at issue. At CP 162, in correspondence to Rodriguez, Longshore discusses his trial strategy with Rodriguez, and in the mix he tells her about his strategy of going to trial before any of the codefendants, which is the same as what appears in item 3. Statements made to third persons are not privileged. *State v. Wilder*, 12 Wn. App.

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

296, 300, 529 P.2d 1109 (1974). The remaining items, 5 and 7, state that Longshore desires suppression of statements and suppression of evidence. But in all cases, the prosecution would assume that the defendant would desire the suppression of incriminating evidence and statements; so, this information was of no use to the State. In fact, none of the information contained in the page at issue, CP 33, was of interest or use to the State for prosecution of this case.

b) Even when assuming that the page at issue in this case is protected by the attorney-client privilege, the trial court did not abuse it's discretion when it denied Longshore's CrR 8.3(b) motion to dismiss the case.

In the instant case there is no evidence to suggest that Detective Moran knowingly or intentionally seized the page at issue, CP 33, from Longshore, nor is there any evidence to suggest that the State knowingly or intentionally disseminated it; instead, the evidence shows that the seizure and dissemination was accidental and unknowing. CP 112-19, 183-84, 187-88, 207-09. Speaking on this point, the trial court judge found that:

> [I]t isn't clear that [Detective Moran] knew [the page at issue] was an attorney-client communication, and that's further supported by the fact he copied it along with the other discovery. It was sent over to the prosecutor's office amid several pages of discovery. It wasn't brought to the attention of [the prosecutor], nor was it

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

> singled out as a significant piece of discovery, and it wasn't analyzed.

RP 132. Thus, the instant case is not a case of knowing, intentional eavesdropping or spying into attorney-client communications.

Regardless whether the intrusion is intentional and egregious or whether it is accidental and unknowing, intrusion into attorney-client communications may violate a defendant's right to effective counsel under the Fifth and Sixth Amendments of the United States Constitution and article I, section 22 of the Washington Constitution. *State v. Peña Fuentes*, 179 Wn.2d 808, 819, 318 P.3d 257 (2014); *State v. Cory*, 62 Wn.2d 371, 373-74, 382 P.2d 1019 (1963).

Nevertheless, "[d]ismissal under CrR 8.3(b) is an 'extraordinary remedy.'" *State v. Blizzard*, 195 Wn. App. 717, 732, 381 P.3d 1241 (2016) (quoting *State v. Puapuaga*, 164 Wn.2d 515, 526, 192 P.3d 360 (2008)). To obtain dismissal under CrR 8.3(b), the burden is on the defendant to show both arbitrary action or governmental misconduct and resulting prejudice that materially affects the defendant's right to a fair trial. *Puapuaga* at 520. Review of a trial court's denial of a motion to dismiss is for an abuse of discretion. *State v. Hanna*, 123 Wn.2d 704, 715, 871 P.2d 135 (1994); *State v. Granacki*, 90 Wn. App. 598, 602 n. 3, 959

P.2d 667 (1998). A trial court abuses its discretion when its decision is manifestly unreasonable when the court exercises its discretion on untenable grounds or for untenable reasons. *State v. Lord*, 161 Wn.2d 276, 283-84, 165 P.3d 1251 (2007).

Where the intrusion is inadvertent, the intrusion into a defendant's confidential attorney-client communications is not automatically deemed a prejudicial violation of the constitutional right to counsel. *State v. Webbe*, 122 Wn. App. 683, 697, 94 P.3d 994 (2004); *State v. Garza*, 99 Wn. App. 291, 298, 994 P.2d 868 (2000) (citing *Weatherford v. Bursey*, 429 U.S. 545, 97 S.Ct. 837, 51 L.Ed.2d 30 (1977)). However, in egregious cases such as *State v. Cory*, 62 Wn.2d 371, 382 P.2d 1019 (1963), and *State v. Granacki*, 90 Wn. App. 598, 959 P.2d 667 (1998) – where the State purposefully spied on defendants' communications with their attorneys – prejudice is presumed, and in such cases the burden shifts to the State to prove beyond a reasonable doubt that the government's misconduct did not prejudice the defendant's right to a fair trial. *State v. Fedorov*, 183 Wn.2d 669, 676, 355 P.3d 1088 (2015); *State v. Peña Fuentes*, 179 Wn.2d 808, 318 P.3d 257 (2014).

But in cases such as the instant case, where the intrusion was inadvertent, governmental misconduct generally does not require dismissal

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

unless the defendant can show actual prejudice. *State v. Granacki*, 90 Wn. App. 598, 604, 959 P.2d 667 (1998). The trial court's decision whether to grant or to deny the CrR 8.3(b) motion for dismissal in such cases is within the trial court's discretion. *Id.* In the instant case, the trial court noted that the State's intrusion into Longshore's attorney-client communication was not purposeful – that it was accidental – and that Longshore suffered no prejudice from the inadvertent intrusion. RP 133-35. Consistent with its factual findings, the trial court exercised its discretion and denied Longshore's motion to dismiss. RP 135.

The mere possibility of prejudice resulting from governmental misconduct is not sufficient to meet the burden of showing actual prejudice. *State v. Norby*, 122 Wn.2d 258, 264, 858 P.2d 210 (1993). The State contends that the page at issue here, CP 33, is so devoid of useful or meaningful information that it, on its face, proves beyond a reasonable doubt that the accidental seizure and disclosure of it presented absolutely no possibility of prejudice to Longshore's right to a fair trial. Relevant to this appeal, the only prejudice alluded to by Longshore is his speculative proposal that, "[a]t a minimum" the page at issue, CP 33, "revealed the defendant's decision to go to trial under all circumstances" and that it "thus spurred a decision by the [S]tate to enter deals with the co-

Mason County Prosecutor
PO Box 639
Shelton, WA 98584
360-427-9670 ext. 417

defendants to testify against the defendant as the privileged document made it clear that the defendant would not enter any type of deal with the prosecution." Br. of Appellant at 11-12. But Longshore does not cite to any part of the record for evidence to support his contentions.

Still more, to show prejudice Longshore must show that the alleged governmental misconduct "materially affected the defendant's right to a fair trial." *State v. Brooks*, 149 Wn. App. 373, 389, 203 P.3d 397 (2009). The page at issue does not support Longshore's contentions that it shows that he would go to trial at any cost and that he would not work any deals, and Longshore does not provide any argument or explanation to support these contentions. Nor are there facts in the record to support Longshore's contention that the State was spurred to make deals with his co-defendants. And Longshore does not offer any argument as to how any of his contentions would amount to a material deprivation of his right to a fair trial.

Because the inadvertent seizure and dissemination of the page at issue did not cause any prejudice to Longshore's right to a fair trial, the trial court did not abuse its discretion by denying Longshore's motion to dismiss.

3. Irrespective of whether the State is the substantially prevailing party in this appeal, the State does not intend to seek appellate costs.

Irrespective of whether the State is the substantially prevailing party in this appeal, the State does not intend to seek an award of appellate costs.

D. CONCLUSION

For the reasons argued above, the State asks this Court to deny Longshore's instant appeal.

DATED: August 2, 2017.

MICHAEL DORCY
Mason County
Prosecuting Attorney

Tim Higgs
Deputy Prosecuting Attorney
WSBA #25919

MASON CO PROS ATY OFFICE

August 02, 2017 - 4:29 PM

Transmittal Information

Filed with Court:	Court of Appeals Division II
Appellate Court Case Number:	49244-0
Appellate Court Case Title:	State of Washington, Respondent v. Charles S. Longshore, III, Appellant
Superior Court Case Number:	12-1-00219-3

The following documents have been uploaded:

- 1-492440_Briefs_20170802162851D2123688_6195.pdf
  This File Contains:
  Briefs - Respondents
  The Original File Name was 49244-0-II --- State v. Longshore --- Brief of Respondent.pdf

A copy of the uploaded files will be sent to:

- jahays@3equitycourt.com
- jahayslaw@comcast.net

Comments:

Sender Name: Timothy Higgs - Email: timh@co.mason.wa.us
Address:
PO BOX 639
SHELTON, WA, 98584-0639
Phone: 360-427-9670 - Extension 417

Note: The Filing Id is 20170802162851D2123688